

**CONTAINS CONFIDENTIAL MATERIAL**

March 8, 2019

British Columbia Utilities Commission
Suite 410
900 Howe Street
Vancouver, BC V6Z 2N3

Attention: Mr. Patrick Wruck, Commission Secretary and Manager, Regulatory Services

**Re: Confidential Responses to the British Columbia Utilities
Commission's and Interveners' Information Requests
on ICBC's 2019 Revenue Requirements Application**

Dear Mr. Wruck:

Further to the filing of its responses to the Round 1 Information Requests, ICBC notes that five information requests relate to the confidential filing entitled BI Segmented Analysis as of August 2018, filed separately with the British Columbia Utilities Commission as Supplementary Information on January 24, 2019 (Exhibit B-1-3)¹, or to the confidential filing of Chapter 3, Technical Appendix E.0, Product Reform Costing Report (Ernst & Young LLP, November 2018) of the 2019 Revenue Requirements Application. They are:

- 2019.1 RR BCUC.13.1C.
- 2019.1 RR BCUC.34.1.1C.
- 2019.1 RR BCUC.37.3C.
- 2019.1 RR BCUC.39.1-1.1C.
- 2019.1 RR TLA.3.47C.

The information in these responses is all of a similar nature, some of which if disclosed, could influence ICBC's settlement negotiations with claimants. The disclosure of information in these responses could therefore prejudice ICBC's financial interest and prejudice Basic insurance policyholders.

In addition, ICBC's responses to two information requests also contain confidential information, which if disclosed, could similarly influence ICBC's settlement negotiations with claimants. The disclosure of the information in these two responses could therefore prejudice ICBC's financial interest and prejudice Basic insurance policyholders. These two information requests are:

- 2019.1 RR RM.3.8C.
- 2019.1 RR TLA.4.148-154C.

¹ The redacted version of the Supplementary Information was filed on January 30, 2019 (Exhibit B-1-4).

For these two sets of responses, given the highly sensitive nature of the information in them, the information is being provided to the BCUC alone and should not be made available to interveners generally.

Finally, ICBC's responses to three other information requests contain information, which if made public, could result in economic harm to the vendors that are currently providing the IT systems that are referenced in these information requests. Disclosure of the information could also impact ICBC's negotiations on future related IT projects which could thereby harm ICBC's financial interest. These three information requests are:

- 2019.1 RR TLA.3.28.dC.
- 2019.1 RR TLA.4.D.3C.
- 2019.1 RR TLA.4.D.4C.

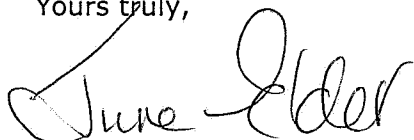
For this set of responses, ICBC is willing to have these documents made available in unredacted form to interveners upon execution of the BCUC's standard undertaking of confidentiality.

ICBC respectfully requests that the above information be treated as confidential in a manner consistent with the BCUC guidelines.

ICBC has prepared redacted versions of the responses and has filed them contemporaneously, along with the Application, under a separate cover letter.

Please direct any further correspondence relating to this confidential filing under confidential cover to my attention.

Yours truly,

A handwritten signature in black ink that reads "June Elder". The signature is written in a cursive, flowing style.

June Elder
Manager, Corporate Regulatory Affairs
gl/ra/jb

Cc: Bill Carpenter, Vice President, Insurance, ICBC

Attachment